

***Allied Waste Industries, Inc.
California Waste Association
California Refuse Removal Council
Inland Empire Disposal Association
Los Angeles County Waste Management Association
Norcal Waste Systems, Inc.
Sanitation Districts of Los Angeles County
Solid Waste Association of Orange County
Waste Management***

Bobbie Garcia
California Integrated Waste Management Board
P.O. Box 4025, MS-10A
Sacramento, CA 95812-4025

Re: 15-day Comments- Permit Implementation Regulations

Dear Ms. Garcia:

Thank you for the opportunity to provide comments on the draft regulations for the proposed permit implementation regulations (AB1497). As we all noted in our testimony, we are appreciative of the excellent deliberative process that has transpired up to this point and we look forward to continuing working with you in the development of the regulations. As we have communicated to CIWMB members and staff, we believe that the draft regulations contain many useful and worthwhile elements.

The undersigned represent the thoughts and comments of a collaborative group of stakeholders that is comprised of solid waste industry facility operators.

With this in mind, we support the following elements of the proposed regulations:

- The new method to change activities at a solid waste facility by means of a “modified permit” to allow modifications to a permit for changes that are less than significant;
- The requirement for additional noticing requirements and informational meetings (hearings) for new and revised permits;
- The requirement for the EA to notify all facility operators when they must apply for a five-year permit review of their permit, bringing consistency to the process;

- The requirement in the draft regulations that maintains a separation between the solid waste facility permit process and the local land use entitlement process, such as conditional use permits (CUPS). As operators, we must adhere to the most restrictive requirements imposed on the operations by our various permits. Moreover, the local land use authority always has the ability to enforce CUP conditions.
- The “minor change “ lists as defined in Option B (Section 21620(a)) of the staff report and with the following additional language:

“(D) the change does not conflict with the design and operation of the facility as described in the current RFI pursuant to Section 21600.

(E) Minor changes include, but are not limited to, the following:”

With reference to this Option B list, we are convinced that it will allow for an expedited processing of minor changes that occur during the normal course of operations and that should not require extra work and effort on the part of the LEA. We note that the items in this list were agreed upon by a broad spectrum of stakeholders during your workshops and have been modified and edited by Board staff to accommodate their concerns.

We also believe that this “minor change” list should not be considered all inclusive, and that it should provide some flexibility on the part of the LEA to either add to this list or reject items on the list as they feel necessary to protect the public health and the environment.

Thanks again for this opportunity to comment.

cc: Members, California Integrated Waste Management Board